



**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2011

Date filed: 1/5/2011

Name of company covered by this certification: DoveTel Communications, LLC

Form 499 Filer ID: 825407

Name of signatory: Kyle Williamson

Title of signatory: CEO

I, Kyle Williamson, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

**Certificate of Compliance Attestation**

As Chief Executive Officer and agent of DoveTel Communications, LLC. I declare that this Certificate of Compliance is true, correct, and complete to the best of my knowledge and belief.

Kyle Williamson: *Kyle Williamson*

Title: CEO

Date: 1/3/2011

## **CPNI Procedures**

DoveTel Communications, LLC (“DoveTel”) has adopted and complies with the following operating procedures to protect the confidentiality of (1) information that relates to the quantity, technical configuration, type, destination, location, or amount of use of the telecommunications services to which its customers subscribe and (2) information contained in bills pertaining to telecommunications services that it provides to its customers (collectively, “Customer Proprietary Network Information” or “CPNI”) and to ensure that DoveTel complies with the Federal Communications Commission’s CPNI rules:

- DoveTel stores all CPNI on a secure computer network.
- DoveTel does not use any CPNI for any marketing purpose.
- DoveTel does not use CPNI for any purpose other than (1) to provide the telecommunications service from which such information is derived, (2) to initiate, render, bill, and collect for such telecommunications services, and (3) to protect the rights or property of DoveTel, or to protect users of DoveTel’s services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.
- Except as provided in the immediately preceding paragraph, DoveTel does not release any CPNI to third parties for any purpose except in response to legal process.
- DoveTel does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers.
- DoveTel does not release any customer’s CPNI to that customer except after positive confirmation of the customer’s identity.
- DoveTel provides periodic training to its employees concerning the importance of maintaining the confidentiality of its customers’ CPNI and the required procedures for ensuring compliance with the CPNI rules.
- DoveTel employees are subject to disciplinary action, including termination in appropriate cases, for violations of DoveTel’s CPNI confidentiality policy.
- Any use or release of any CPNI by any DoveTel employee requires the approval of a supervisor who is knowledgeable concerning DoveTel’s CPNI policies and the requirements of the CPNI rules.
- DoveTel requires all customers to use a password, or visit our retail office, or have an authorized DoveTel representative call the customers telephone number of record served by DoveTel, or in the case of Business accounts with dedicated points of contact and a dedicated DoveTel support team who have

contractual verbiage concerning CPNI access in their service agreement with DoveTel to access any CPNI. All passwords are secure and protected from any outside or inside attack.

- DoveTel requires each customer to identify himself or herself to an employee of DoveTel using information previously provided by the customer.. DoveTel does not reset passwords based upon readily available biographical information or account information.
- DoveTel keeps logs of all transactions that impact CPNI either by the customer directly using a DoveTel portal or by a DoveTel employee.